

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF MISSISSIPPI
3 OXFORD DIVISION
4

5 DR. AMY R. WOODS

PLAINTIFF

6
7 v. CIVIL ACTION NO.: 3:19-00234-NBB-RP
8

9 MHM HEALTH PROFESSIONALS, LLC
10 D/B/A CENTURION PROFESSIONALS,
11 MANAGEMENT & TRAINING CORPORATION,
JESSE WILLIAMS, INDIVIDUALLY,
AND JOHN DOES 1-9,

DEFENDANTS

12
13
14
15 VIDEOTAPED DEPOSITION OF DR. AMY WOODS
16
17
18

19 Taken at the instance of the Defendant at Waide &
20 Associates, P.A., 332 N. Spring Street, Tupelo,
Mississippi on Monday, June 22, 2020, beginning at
21 10:11 a.m.
22
23

24 LORI W. BUSICK, CVR-S, CCR #1677

25 Job #31830

EXHIBIT

D

tabbles

DR. AMY R. WOODS vs MHM HEALTH PROFESSIONALS
Amy Woods June 22, 2020 Outside Counsel Only

Job 31830
Pages 18..21

<p style="text-align: right;">Page 18</p> <p>1 Q. Okay. Fifteen to 20.</p> <p>2 A. And that's a guess. That's hard to say.</p> <p>3 Q. That's fine.</p> <p>4 Did you talk with him when you ran into</p> <p>5 him --</p> <p>6 A. Sure.</p> <p>7 Q. -- these 15 to 20 times?</p> <p>8 A. Sure.</p> <p>9 Q. What did y'all talk about?</p> <p>10 A. Most of the times that I'd seen him, it</p> <p>11 was prior to my job at the facility. He helped us</p> <p>12 with a nonprofit that I used to run.</p> <p>13 Q. Okay.</p> <p>14 A. He has a business that we would order</p> <p>15 things from, like a T-shirt printing business. So</p> <p>16 in that capacity. More through that nonprofit is</p> <p>17 where I did have interaction with him. I had very</p> <p>18 little interaction with Mr. Kincaid while I was</p> <p>19 actually employed by Centurion.</p> <p>20 Q. Well, let's talk about the nonprofit.</p> <p>21 A. Sure.</p> <p>22 Q. Tell me the name of the nonprofit?</p> <p>23 A. Hearts & Hands Ministries.</p> <p>24 Q. Okay. Tell me what Hearts & Hands does.</p> <p>25 A. So Hearts & Hands is a Outreach located in</p>	<p style="text-align: right;">Page 19</p> <p>1 Byhalia, which is in Marshall County.</p> <p>2 Q. Yes, ma'am.</p> <p>3 A. Serve food and clothing to needy people is</p> <p>4 basically what it provides in the community.</p> <p>5 Q. Okay.</p> <p>6 A. I'm no longer affiliated with it but I</p> <p>7 helped start it. And so during that start-up</p> <p>8 process I think we printed some T-shirts, sold</p> <p>9 T-shirts, that kind of thing. We gave out backpacks</p> <p>10 to kids in our community. We ordered backpacks</p> <p>11 through Mr. Kincaid's business. And so, it was more</p> <p>12 on that level that I had interaction with him versus</p> <p>13 his role as a representative.</p> <p>14 Q. So he sold you T-shirts that you would in</p> <p>15 turn sell to raise money for the ministry?</p> <p>16 A. So the Hearts & Hands bought T-shirts</p> <p>17 though his business Champion Awards, I believe is</p> <p>18 what it's called.</p> <p>19 Q. How long did y'all by T-shirts through --</p> <p>20 A. I think it was a one-time thing. It was</p> <p>21 like an initial startup. We ordered some T-shirts</p> <p>22 printed and volunteers wore the T-shirts like at</p> <p>23 different events and that type of thing.</p> <p>24 Q. Did you run into him any more after you</p> <p>25 bought the T-shirts from him?</p>
<p style="text-align: right;">Page 20</p> <p>1 A. I believe I saw him at a restaurant maybe</p> <p>2 one night. Said hello, spoke casually.</p> <p>3 Q. Sure.</p> <p>4 A. At, it was Marshall's Steak House I</p> <p>5 believe is where I saw him. And I can't recall any</p> <p>6 other specific time that I remember seeing him. He</p> <p>7 bought -- I sold -- I had some stools for sale and</p> <p>8 he bought those from me, like a bar stool.</p> <p>9 Q. What did he buy your stools for?</p> <p>10 A. I guess to put in his house; I'm not sure.</p> <p>11 Q. They were household kind of stools?</p> <p>12 A. Yeah. Yeah. Like something that you</p> <p>13 would sell. I think I had posted maybe on Facebook</p> <p>14 or Marketplace that I was selling them.</p> <p>15 Q. Those were your stools --</p> <p>16 A. Sure.</p> <p>17 Q. -- that you had at your home?</p> <p>18 A. Sure. Personal, like a personal sale and</p> <p>19 picked those up. And now, I believe that was before</p> <p>20 I was even working at the prison. I believe all</p> <p>21 that occurred before I was employed. I had very</p> <p>22 little contact with Mr. Kincaid during my time of</p> <p>23 employment. He did come to the facility and tour</p> <p>24 after I first started there as the head of</p> <p>25 Correctional Committee with a group. I'm going to</p>	<p style="text-align: right;">Page 21</p> <p>1 say that was in 2017, because I had not been at the</p> <p>2 facility for a long time. And I remember he did</p> <p>3 come on site to the facility for a tour.</p> <p>4 Q. You said hello?</p> <p>5 A. And I spoke casually to him there. There</p> <p>6 was no private conversation there.</p> <p>7 Q. Okay. So would it be accurate to say that</p> <p>8 you've known Mr. Kincaid, Representative Kincaid for</p> <p>9 a number of years?</p> <p>10 A. Several years.</p> <p>11 Q. And in fact, several years even before you</p> <p>12 came to work for --</p> <p>13 A. Correct.</p> <p>14 Q. -- MHM?</p> <p>15 A. Correct.</p> <p>16 Q. You had at least one conversation with him</p> <p>17 while you worked for MHM while --</p> <p>18 A. At the facility.</p> <p>19 Q. The time he toured the facility?</p> <p>20 A. Sure. Sure.</p> <p>21 Q. Have you had any other conversation with</p> <p>22 him before then? Either before or after then about</p> <p>23 the MHM facility or about the prison itself?</p> <p>24 A. The only other conversation I had with him</p> <p>25 was after I was fired.</p>

DR. AMY R. WOODS vs MHM HEALTH PROFESSIONALS
Amy Woods June 22, 2020 Outside Counsel Only

Job 31830
Pages 66..69

<p style="text-align: right;">Page 66</p> <p>1 Q. Oh, okay.</p> <p>2 A. You know, so you go through -- when you</p> <p>3 come into Marshall County you go through</p> <p>4 administrative offices first.</p> <p>5 Q. Right.</p> <p>6 A. Then you pass by like the lunchroom area</p> <p>7 snack/break area.</p> <p>8 Q. Yes, ma'am.</p> <p>9 A. And then it veers off. You can, if you</p> <p>10 take one route it will take you around to the</p> <p>11 medical unit.</p> <p>12 Q. Okay.</p> <p>13 A. And some other offices and things that I</p> <p>14 think the administration uses.</p> <p>15 And then after that, but if you keep going</p> <p>16 straight there's a, you know, a big typical gate</p> <p>17 like you see that moves back and forth, opens by</p> <p>18 central control. Then there's a long catwalk that's</p> <p>19 kind of -- you walk down and then that's the housing</p> <p>20 unit where all the inmate housing is.</p> <p>21 Q. And is Delta 4 separated from the other</p> <p>22 inmate housing?</p> <p>23 A. It's in that.</p> <p>24 Q. It's in that?</p> <p>25 A. It's not really separate.</p>	<p style="text-align: right;">Page 67</p> <p>1 Q. It's just a special part --</p> <p>2 A. Yes.</p> <p>3 Q. -- of that facility?</p> <p>4 A. Correct.</p> <p>5 Q. Okay. Let me ask about these other --</p> <p>6 You say on your oath you didn't talk to</p> <p>7 Mr. Kincaid, representative --</p> <p>8 A. About staffing numbers, no.</p> <p>9 Q. About anything --</p> <p>10 A. No.</p> <p>11 Q. -- relating to the prison?</p> <p>12 A. Correct.</p> <p>13 Q. And the other representatives, you didn't</p> <p>14 talk to any of them?</p> <p>15 A. I did not. Not about anything related to</p> <p>16 the prison. I volunteered as Doctor of The Day at</p> <p>17 some point at the capital through the State Medical</p> <p>18 Association. And, you know, you -- generally one of</p> <p>19 your representatives introduces you.</p> <p>20 Q. Yes, ma'am.</p> <p>21 A. And Kevin Blackwell introduced me --</p> <p>22 Q. Yes, ma'am.</p> <p>23 A. -- the day that I was there.</p> <p>24 Q. Did you encourage any of the other</p> <p>25 personnel at MHM to talk to their representatives?</p>
<p style="text-align: right;">Page 68</p> <p>1 A. I didn't encourage them to. The people</p> <p>2 that contacted the representatives did that on their</p> <p>3 own.</p> <p>4 Q. Did you discourage them?</p> <p>5 A. No.</p> <p>6 Q. Did you tell them they shouldn't be doing</p> <p>7 that?</p> <p>8 A. I didn't.</p> <p>9 Q. Did you think they should be doing it?</p> <p>10 A. I think if they wanted to do that that was</p> <p>11 well within their rights.</p> <p>12 Q. There is a chain of command at MHM, isn't</p> <p>13 there?</p> <p>14 A. I'm sure. Yes, sir.</p> <p>15 Q. And you're supposed to use that when you</p> <p>16 have complaints, aren't you?</p> <p>17 A. I'm sure. Yes, sir.</p> <p>18 Q. And there's an escalation policy where</p> <p>19 you're supposed to escalate problems that are not</p> <p>20 solved to that policy?</p> <p>21 A. Okay. I'm sure that there is, yes.</p> <p>22 Q. And then there's a 1-800 number, right?</p> <p>23 A. I wasn't aware of that, but...</p> <p>24 Q. It's in the handbook?</p> <p>25 A. I know a lot of companies have that. I</p>	<p style="text-align: right;">Page 69</p> <p>1 mean, yes, some kind of number you can call with a</p> <p>2 complaint that hasn't been resolved.</p> <p>3 Q. Have you seen the handbook before?</p> <p>4 A. I'm sure when I started it was given to</p> <p>5 me.</p> <p>6 Q. Yes, ma'am. And the reason companies have</p> <p>7 those policies is so that you can have multiple ways</p> <p>8 to communicate a problem, right?</p> <p>9 A. Right.</p> <p>10 Q. And that's designed to let the company</p> <p>11 deal with its problems first, right?</p> <p>12 A. I'm sure.</p> <p>13 Q. And if you jump over and talk to other</p> <p>14 folks you don't give the company a chance, do you,</p> <p>15 to fix the problem?</p> <p>16 A. Right.</p> <p>17 Q. So it's important that you follow that,</p> <p>18 right?</p> <p>19 A. Yes.</p> <p>20 Q. You said earlier that getting patients to</p> <p>21 medical was more difficult after the violent</p> <p>22 incidents. Tell me what you mean by that.</p> <p>23 A. So the whole time that I worked there, it</p> <p>24 was always difficult to get patients to medical.</p> <p>25 Q. Meaning a specific type patient or all</p>

DR. AMY R. WOODS vs MHM HEALTH PROFESSIONALS
Amy Woods June 22, 2020 Outside Counsel Only

Job 31830
Pages 254..257

<p style="text-align: right;">Page 254</p> <p>1 call their name, no.</p> <p>2 Q. Would you be able to identify them by</p> <p>3 rank? I mean, are they correctional officers?</p> <p>4 A. Correctional officers. Definitely</p> <p>5 correctional officers, not higher level security.</p> <p>6 Q. Not a captain or major or even maybe a --</p> <p>7 or lieutenants? I don't know if you're familiar</p> <p>8 with all the different ranks?</p> <p>9 A. Right. They were correctional officers.</p> <p>10 And I know I -- when he initially came, when he</p> <p>11 first started working at the facility, I know every</p> <p>12 day -- like I saw him leaving in the car with one.</p> <p>13 Because he would -- they would often leave at the</p> <p>14 same time I was leaving the facility. And so I did</p> <p>15 see him leaving in a car with a correctional officer</p> <p>16 who was also doing -- who was new to the facility</p> <p>17 and was doing training, MDOC training, like I</p> <p>18 indicated the first week we have to do. I saw him</p> <p>19 leaving with one of the new officers every day.</p> <p>20 Because she asked me one day if he was coming out</p> <p>21 behind of the facility. And, you know, it struck me</p> <p>22 as a little bit unusual.</p> <p>23 Q. Did you believe that they were, this</p> <p>24 Travis and this woman were seeing each other</p> <p>25 romantically?</p>	<p style="text-align: right;">Page 255</p> <p>1 A. I didn't necessarily believe it. I didn't</p> <p>2 know.</p> <p>3 Q. Right. As you told David, he had only</p> <p>4 been there a little while. It's just something you</p> <p>5 had never seen done before?</p> <p>6 A. Right. I just thought it a little bit</p> <p>7 unusual.</p> <p>8 Q. Did you report -- I think you told him you</p> <p>9 didn't --</p> <p>10 A. I didn't.</p> <p>11 Q. -- report that to anybody?</p> <p>12 A. I didn't.</p> <p>13 Q. Just weren't there long enough to --</p> <p>14 A. I didn't really -- and you know a lot of</p> <p>15 times, if you don't see something that you're clear</p> <p>16 that you know what's going on, it's not necessarily,</p> <p>17 until you have more information to probably report</p> <p>18 it to anybody. I just remarked that, you know, I</p> <p>19 remember thinking that's just a little bit unusual</p> <p>20 because he's our health services administrator and</p> <p>21 he spends a lot of time with the security staff.</p> <p>22 Q. And you said you felt your impression of</p> <p>23 Travis Day was that he was more focused on the</p> <p>24 relationship with security rather than focusing on</p> <p>25 the medical; is that fair?</p>
<p style="text-align: right;">Page 256</p> <p>1 A. Sure. Yes, that's fair.</p> <p>2 Q. And you -- your expectation of someone of</p> <p>3 that HSA role, would be to focus more on the</p> <p>4 medical?</p> <p>5 A. Right. I think you have to -- you do have</p> <p>6 to do the liaison role and I understand that that's</p> <p>7 part of it. To build bridges with security and that</p> <p>8 is very important. It seemed more of a priority for</p> <p>9 him to keep -- to make security happy versus</p> <p>10 ensuring that, for example, when we had an</p> <p>11 optometrist there eight hours a month, that we need</p> <p>12 to get those patients to medical that need to see an</p> <p>13 optometrist.</p> <p>14 Q. The HSA, in your mind, needs to be</p> <p>15 aggressive, if needed, to get patients back there to</p> <p>16 see you?</p> <p>17 A. Yes.</p> <p>18 Q. Or do whatever -- I think your phrase was,</p> <p>19 do whatever it takes to get the patients back for us</p> <p>20 to see them?</p> <p>21 A. Right. You've got to go to bat. You've</p> <p>22 got to go -- you've got to -- like security has a</p> <p>23 lot of things going on. They are responsible for</p> <p>24 making sure inmates get fed and showered and rec</p> <p>25 time and this. So we got to get -- but we are, too.</p>	<p style="text-align: right;">Page 257</p> <p>1 I mean, we have to get them. And so HSAs, one of</p> <p>2 the primary roles is to get the inmates to medical</p> <p>3 for the care that they need and advocate.</p> <p>4 Q. Did you ever complain to anyone higher up</p> <p>5 about Mr. Day for any reason?</p> <p>6 A. No.</p> <p>7 Q. You didn't report up the chain that he --</p> <p>8 that your perception was that he was more focused</p> <p>9 on, frankly, hanging out with the female</p> <p>10 correctional officers than --</p> <p>11 A. No. I mean, I feel like if I had been</p> <p>12 there any more length of time, I would have. Yes,</p> <p>13 it would have come to that if I was still there, you</p> <p>14 know, and the behavior continued. You know,</p> <p>15 sometimes it good to sit back and just watch for a</p> <p>16 little while and see what's going on. We didn't</p> <p>17 work together long enough for me to really have to</p> <p>18 go to anybody about him, frankly.</p> <p>19 Q. Did you ever tell Travis, threaten him or</p> <p>20 ever give him the impression you were on the cusps</p> <p>21 of reporting him?</p> <p>22 A. Not that I'm aware of, no.</p> <p>23 Q. And you didn't reach out -- well, did you</p> <p>24 ever reach out to Dr. Ramsue about any issues you</p> <p>25 were having with the warden? Meaning, did you ever</p>